

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION**

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BABY DOE, A CITIZEN OF AFGHANISTAN	:	
CURRENTLY RESIDING IN NORTH	:	CIVIL ACTION NO. 3:22-CV-49
CAROLINA, BY AND THROUGH NEXT	:	
FRIENDS, JOHN AND JANE DOE;AND JOHN	:	
AND JANE DOE, CITIZENS OF AFGHANISTAN:	:	
AND LEGAL GUARDIANS OF BABY DOE,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
JOSHUA MAST, STEPHANIE MAST, RICHARD	:	
MAST, KIMBERLEY MOTLEY, AND AHMAD	:	
OSMANI,	:	
	:	
Defendants,	:	
	:	
and	:	
	:	
UNITED STATES SECRETARY OF STATE	:	
ANTONY BLINKEN AND UNITED STATES	:	
SECRETARY OF DEFENSE GENERAL	:	
LLOYD AUSTIN,	:	
	:	
Nominal Defendants.	:	

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**PLAINTIFFS' MOTION TO SEAL EXHIBIT 4 TO PLAINTIFFS' OPPOSITION  
TO DEFENDANT RICHARD MAST'S MOTION TO VACATE PROTECTIVE ORDER**

Plaintiffs, by counsel, respectfully move for leave to file Exhibit 4 to Plaintiffs' Opposition to Defendant Richard Mast's Motion to Vacate Protective Order under seal, pursuant to Local Civil Rule 9. The Exhibit sought to be filed under seal is being filed electronically with the Court contemporaneously herewith, as required by Local Civil Rule 9. As further grounds for this

motion, Plaintiffs refer to the Memorandum in Support of this Motion, filed contemporaneously herewith. A proposed Order is attached..

Dated: March 17, 2023

Respectfully submitted,

/s/ Maya Eckstein

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*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 17<sup>th</sup> day of March 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing to all CM/ECF participants.

By: /s/ Maya M. Eckstein  
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